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REPLY TO MONTCLAIR OFFICE

July 10, 2018

Filed via ECF

Hon. Kimba M. Wood, U.S.D.J.  
Moynihan United States Courthouse  
500 Pearl Street  
New York, N.Y. 10007

Re: United States v. Juxhin Uli,  
17-cr-00641 (KMW)

Dear Judge Wood:

This letter-motion is respectfully submitted, without opposition from the United States or Pretrial Services, for a modification of Mr. Uli's conditions of release. Specifically, I request court approval for the removal of Mr. Uli's ankle bracelet monitoring device. He has now entered a guilty plea to a lesser offense pursuant to a plea agreement that acknowledges his qualification for "safety valve" consideration at sentence. He has been in complete compliance with all conditions of release. The ankle bracelet is cumbersome and sometimes leads to embarrassing questions.

As noted, Pretrial Services is fine with this modification. The government is not opposed. Realistically, Mr. Uli does not represent a threat to the community or present a risk of flight. All other conditions of release, including supervision, would remain in effect

Your Honor's attention to this matter is appreciated. Please advise if the Court has any questions or concerns.

Respectfully submitted,  
*/s/ David A. Ruhnke*  
David A. Ruhnke

Copy via ECF:     Drew Skinner, A.U.S.A.